

## REMARKS

The objections under Section 112 in paragraphs 2 and 3 have been cured by appropriate amendments.

Reconsideration of the rejection of claim 34, under Section 102, is respectfully requested. It is respectfully submitted that the cited reference is actually the opposite or mirror image of what is claimed.

In column 3 in the cited material, there is a reference to a solder mask. As explained in column 1, at lines 24 *et seq.*, a solder mask is not really a mask. It is simply a material that is put down to prevent the solder from flowing to adjacent solder landings and shorting the package. Thus, the solder mask 32 is something that is put down on the package. It is pointed out in column 3, lines 11-13, that the solder mask 32 can be applied with conventional screening techniques known in the art. Thus, presumably, the Examiner contends that there is a screen that is utilized to provide the solder mask.

The solder mask 32 is best shown in Figure 4. There it can be seen that the solder mask has openings 34. In other words, the entire surface of the package is covered in the region marked 32, with the exception of the openings 34.

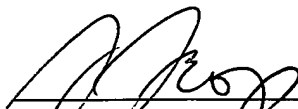
The stencil that put down the mask 32 had to have protrusions or landings to block the solder mask from being formed at 34 in low areas surrounding those landings. Thus, it can be appreciated that the presumptive mask of the cited reference is the opposite of what is claimed. It does not include segmental annular openings, but, instead, uses segmental annular raised portions and necessarily forms annular openings around those raised portions. How such a structure could be made in a plate is very uncertain. It is believed that there may be no possible way to do so.

Thus, the reference should be distinguishable because the asserted stencil plate is nowhere shown and there is good reason to believe that such a stencil plate would be impossible to make. But, even ignoring that argument, the stencil plate that would make the structure shown in Figure 4 is the opposite or mirror image of what is claimed.

Therefore, reconsideration of the rejection of claim 34 and its dependent claims is respectfully requested.

Respectfully submitted,

Date: December 8, 2004



---

Timothy N. Trop, Reg. No. 28,994  
TROP, PRUNER & HU, P.C.  
8554 Katy Freeway, Ste. 100  
Houston, TX 77024  
713/468-8880 [Phone]  
713/468-8883 [Fax]